STATE OF RHODE ISLAND PROVIDENCE, SC

vs.

SUPERIOR COURT

PATRICK C. LYNCH in his Official
Capacity as the Attorney General of the
STATE OF RHODE ISLAND, DONALD
L. CARCIERI, in his official capacity as the
Governor of the State of Rhode Island

C.A. No.

MATTHEW A. BROWN in his Official Capacity as the Secretary of State for the STATE OF RHODE ISLAND

MOTION FOR INJUNCTIVE RELIEF

Now come the Plaintiffs and request that this Honorable Court issue a Temporary Restraining Order, as well as permanent injunctive relief prohibiting the Secretary of State from causing to be placed on the ballot for the November 2, 2004 election the following question: "Shall there be a casino in the Town of West Warwick operated by an Affiliate of Harrah's Entertainment in association with the Narragansett Indian Tribe?" Plaintiffs would show that there is a likelihood of success on the merits, that there will be irreparable harm if the question is allowed to appear on the ballot, that there is inadequate remedy at law, and the public interest will be served by issuance of such relief. A memorandum in support hereof is attached.

Respectfully submitted,

PATRICK C. LYNCH ATTORNEY GENERAL

y His Attorney

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CERTIFICATION

I, the undersigned, hereby certify that I hand-delivered a true copy of the within Motion for Injunctive Relief, on this day of August 2004 to those indicated below:

Matthew A. Brown Secretary of State 100 North Main Street Providence, RI 02903